

United States District Court  
Western District of Washington

Honorable Richard A. Jones

**COURT'S GENERAL VOIR DIRE QUESTIONS (CRIMINAL)**

1. THIS TRIAL IS EXPECTED TO LAST FOR \_\_\_\_ DAYS. AT LEAST THAT'S WHAT THE ATTORNEYS TELL ME. REMEMBER, THERE IS NO TIME LIMIT ON THE AMOUNT OF TIME THAT ANY PARTICULAR JURY MAY DELIBERATE. IS THERE ANY JUROR WHO CANNOT BE HERE FOR THE ANTICIPATED DURATION OF THE TRIAL? (**EXPLAIN HARDSHIP.**)
2. IS THERE ANYTHING ABOUT THE NATURE OF THIS CASE THAT WOULD CAUSE ANY PROSPECTIVE JUROR TO START INTO THE TRIAL WITH ANY BIAS OR PREJUDICE, EITHER ONE WAY OR ANOTHER?
3. IS THERE ANY HEALTH ISSUE, PHYSICAL PROBLEMS OR PERSISTENT PHYSICAL AGGRAVATION OR OTHER PROBLEM THAT WOULD MAKE IT DIFFICULT FOR YOU TO SIT AS A JUROR? (BAD BACK, MIGRAINES, ETC).
4. THE COURT PREVIOUSLY INTRODUCED THE ASSISTANT UNITED STATES ATTORNEY(S) \_\_\_\_\_, AND I NOW ASK IF ANYONE KNOWS THE AUSA(S) \_\_\_\_\_ OR ANYONE IN THE UNITED STATES ATTORNEY'S OFFICE?
5. THE COURT PREVIOUSLY INTRODUCED THE DEFENSE ATTORNEY AND I NOW ASK IF ANYONE KNOWS THE DEFENDANT OR ANY OF HIS/HER LAWYERS IN THIS CASE?
6. HAVE ANY OF YOU HEARD OR READ ANYTHING ABOUT THIS CASE?

7. I WILL NOW HAVE COUNSEL FOR THE GOVERNMENT LIST ALL OF THE WITNESSES THAT HE/SHE EXPECTS MIGHT BE CALLED TO TESTIFY. PLEASE RAISE YOUR HAND IF YOU BELIEVE THAT YOU KNOW ANY OF THESE WITNESSES. (GOVERNMENT'S COUNSEL READS NAMES).
8. I WILL NOW HAVE COUNSEL FOR THE DEFENDANT LIST ALL OF THE WITNESSES THAT HE/SHE EXPECTS MIGHT BE CALLED TO TESTIFY. PLEASE RAISE YOUR HAND IF YOU BELIEVE THAT YOU KNOW ANY OF THESE WITNESSES. (DEFENSE COUNSEL READS NAMES).
9. DO ANY OF YOU KNOW ANYONE WHO WORKS IN THE LEGAL SYSTEM: JUDGE, LAWYER, CLERK, PROBATION OFFICER, PARALEGAL, ETC?
10. DO YOU HAVE ANY TRAINING OR WORK EXPERIENCE IN THE FIELD OF LAW?
11. ARE YOU, CLOSE FRIENDS OR RELATIVES CONNECTED WITH LAW ENFORCEMENT EITHER FEDERAL, STATE, COUNTY, CITY OR PRIVATE?
12. HAVE YOU SERVED AS A JUROR IN A CRIMINAL OR A CIVIL CASE OR AS A MEMBER OF A GRAND JURY IN EITHER A FEDERAL OR STATE COURT?  
  
(A) HAVE YOU EVER SERVED AS THE FOREPERSON?
13. HAVE YOU EVER BEEN A WITNESS BEFORE IN ANY COURT PROCEEDING? (NOT DEPOSITION)
14. DOES ANYONE KNOW ANY OF THE OTHER JURORS FROM ANY CONTACT OTHER THAN YOUR MEETING THIS MORNING?
15. HAVE YOU, YOUR CLOSE FRIENDS OR RELATIVES, EVER BEEN A LITIGANT/PARTY IN A COURT HEARING OR PROCEEDING?

16. HAVE YOU, A RELATIVE OR A CLOSE FRIEND, EVER BEEN ACCUSED RIGHTLY OR WRONGLY WITH COMMITTING A CRIMINAL OFFENSE?

IF SO, DID YOU THINK THAT THE POLICE AND THE PROSECUTION OFFICIALS CONDUCTED THEMSELVES PROPERLY?

17. HAVE YOU EVER HAD AN UNFAVORABLE EXPERIENCE WITH A LAW ENFORCEMENT OFFICER OR A PROSECUTOR? HAS ANYONE, RELATIVE OR CLOSE FRIEND, BEEN INVOLVED IN ANY SORT OF LAWSUIT AGAINST THE FEDERAL GOVERNMENT?

(A) WAS IT RESOLVED TO YOUR SATISFACTION?

(B) WOULD ANYTHING ABOUT THAT EXPERIENCE PREVENT YOU FROM BEING A FAIR AND IMPARTIAL JUROR IN THIS CASE?

18. HAVE YOU, CLOSE FRIENDS OR FAMILY MEMBER EVER BEEN THE VICTIM OF A CRIMINAL OFFENSE?

19. DO ANY OF YOU HAVE ANY MORAL, RELIGIOUS, OR PHILOSOPHICAL BELIEFS THAT WOULD PREVENT YOU FROM RETURNING A VERDICT AGAINST ANOTHER PERSON IN A CRIMINAL CASE?

20. AS A JUROR IN A CRIMINAL CASE, YOUR OBLIGATION WOULD BE TO LISTEN TO THE EVIDENCE AND FROM THAT DETERMINE THE FACTS ACCORDING TO THE LAW AS GIVEN TO YOU BY THE COURT. YOU MUST FOLLOW THE COURT'S INSTRUCTIONS ON THE LAW EVEN IF YOU DISAGREE WITH THEM. IS THERE ANYONE WHO WOULD BE UNABLE OR UNWILLING TO FOLLOW THE COURT'S INSTRUCTIONS IF YOU THOUGHT THE LAW WAS UNWISE OR WRONG?

21. YOU WILL BE INSTRUCTED THAT THE DEFENDANT IS PRESUMED TO BE INNOCENT UNTIL PROVEN GUILTY AND THE BURDEN IS UPON THE GOVERNMENT TO PROVE THE DEFENDANT(S) GUILTY BEYOND A REASONABLE DOUBT. IS THERE ANYONE AMONG YOU WHO HAS A QUARREL WITH THESE PRINCIPLES OF LAW?
22. CAN YOU THINK OF ANY REASON THAT WOULD PREVENT YOU FROM BEING ABLE TO RENDER A FAIR AND IMPARTIAL VERDICT IN THIS CASE?

[INSERT QUESTIONS RELATING TO THIS PARTICULAR TYPE OF CASE]

23. I WILL NOW PERMIT THE LAWYERS TO HAVE \_\_\_\_\_ MINUTES PER SIDE TO ASK ADDITIONAL VOIR DIRE QUESTIONS.